

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

DALLAS BUYERS CLUB, LLC,)
)
Plaintiff,)
)
v.) No.
) 3:15-CV-0907-AC
JOHN HUSZAR,)
)
Defendant.)

30(b)(6) DEPOSITION OF ROBERT D. YOUNG

Taken in behalf of Defendant

January 2, 2018

*** Contains confidential testimony ***

*** Pages 53-79 ***

LEEDHAM COURT REPORTING, INC.

29288 SW Costa Circle E

Wilsonville, OR 97070

(503) 803-1041

leedhamreporting@comcast.net

Robert Young - 1/2/2018

1 ROBERT D. YOUNG,
2 having first been sworn to tell the truth by the
3 reporter, testified under oath as follows:
4

08:54 5 MR. CROWELL: On the record, we're here in
6 response to your 30(b)(6) notice to Dallas Buyers
7 Club for issues on -- I have the defendant's notice
8 dated November 17th. So one topic, items A through
9 G, Dallas Buyers Club is responding by producing
08:55 10 third-party Robert Young who's been recently educated
11 as to all matters reasonably available to Dallas
12 Buyers Club on your topics to the extent there are
13 appropriate responses.

14 I've presented to you today with a
08:55 15 five-page response to your 30(b)(6) notice outlining
16 texturally responses to each of your topics. And you
17 have a number of exhibits -- I believe it's A through
18 G -- to the plaintiff's 30(b)(6) response.

19 And I believe you've already made at least
08:55 20 one extra copy of that -- those documents; correct?

21 MR. EDMONDSON: Well, they're being copied
22 right now, so if we use them, then we'll attach them
23 as exhibits.

24 MR. CROWELL: Do you have it in front of
08:55 25 you as well?

Robert Young - 1/2/2018

1 MR. CROWELL: I mean are you looking for a
2 handful of questions to be done for the day?

3 MR. EDMONDSON: No. During lunch I'm
4 going to review these reports that you gave me, so --

5 MR. CROWELL: Mr. Madden, let's go ahead

6 and finish with you, and then you can be done for the
7 day, and we can go back to Mr. Edmondson, unless
8 Mr. Toth wants to ask questions as well.

9 MR. EDMONDSON: We'll see.

BY MR. MADDEN:

11 Q. You may have covered this with Curt. Did you
12 ever personally run the Maverick program that you had
13 the source code for?

14 A. No.

15 Q. Did you set up a test network in which
16 BitTorrent activity could take place and observe
17 activity in that network?

18 | A. No.

19 MR. MADDEN: Okay. That's what I wanted
20 to ask.

21 | MR. EDMONDSON: Okay.

22

FURTHER EXAMINATION

24 BY MR. EDMONDSON:

25 Q. Looking at Exhibit 6 there, Mr. Young, based on